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October 25, 2024

VIA ECF

Honorable Ona T. Wang
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: *The Center for Investigative Reporting v. OpenAI Inc., et al.* (1:24-cv-04872-SHS-OTW), *The New York Times Co. v. Microsoft Corp. et al.* (23-cv-11195-SHS-OTW) and *Daily News, LP et al. v. Microsoft Corp. et al.* (24-cv-03285-SHS-OTW) - Oral Argument Request

Dear Judge Wang:

On behalf of the OpenAI defendants¹ and Microsoft Corporation, I write pursuant to Rule 2.F of Your Honor's Individual Practices to respectfully request oral argument on Open AI's and Microsoft's Joint Motion to Consolidate *The Center for Investigative Reporting v. OpenAI Inc., et al.* (1:24-cv-04872-SHS-OTW) with the already-consolidated *The New York Times Co. v. Microsoft Corp. et al.* (23-cv-11195-SHS-OTW) and *Daily News, LP et al. v. Microsoft Corp. et al.* (24-cv-03285-SHS-OTW) cases.

Respectfully submitted,



Paven Malhotra

cc: All Counsel of Record (via ECF)

¹ OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC.